

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

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KRISTINA HEMPEL-DUBOIS

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES, LLC  
A/K/A PORTFOLIO ASSOCIATES

Defendants.

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Case No. 1:11-cv-00009-JD

**ASSENTED –TO MOTION TO EXTEND TIME TO FILE  
RESPONSIVE PLEADING**

Defendant, Portfolio Recovery Associates, LLC moves for an additional week to file a response to Plaintiff's Amended Complaint to April 25, 2011, stating as follows:

1. PRA needs one additional week to file a responsive pleading to the First Amended Complaint, which asserts additional federal claims.
2. Counsel for Plaintiff assents to extending the deadline for filing a responsive pleading to April 25, 2011.
3. The short extension of the time to file a responsive pleading will not result in the continuance of any hearing, conference, or trial, since the Parties have already agreed to a comprehensive discovery plan.
4. Due to the brevity of this motion and the nature of the relief requested, no separate memorandum of law is necessary.

WHEREFORE, PRA respectfully requests that the Court:

- A. Allow PRA until April 25, 2011 to file a responsive pleading to the Amended Complaint; and
- B. Order any other just and appropriate relief.

Respectfully submitted,

**PORTFOLIO RECOVERY ASSOCIATES, LLC**

By its attorneys,

**SHEEHAN, PHINNEY, BASS + GREEN**

Dated: April 18, 2011

By: /s/ John-Mark Turner  
John-Mark Turner, N.H. Bar. No. 15610  
Jason D. Gregoire, N.H. Bar No. 20092  
Sheehan Phinney Bass + Green, P.A.  
1000 Elm Street, P.O. Box 3701  
Manchester, NH 03101  
(603) 668-8150  
[jturner@sheehan.com](mailto:jturner@sheehan.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Roger B. Phillips  
Phillips Law Office, PLLC  
104 Pleasant Street  
Concord, NH 03301

/s/ John-Mark Turner  
John-Mark Turner